

THE LAW FIRM OF JOSEPH H. LOW, IV

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DAVID RIBOT, *ET AL.*

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

DAVID RIBOT, PERRY HALL, JR.,
DEBORAH MILLS, ANTHONY
BUTLER, JENNIFER BUTLER,
JONATHAN LUNA, RITA DUNKEN,
and LOIS BARNES, individually, and
on behalf of all others similarly situated,

Plaintiffs,

v.

FARMERS SERVICES, LLC.,
FARMERS INSURANCE
EXCHANGE, and 21ST CENTURY
INSURANCE COMPANY

Defendants.

CASE NO. 2:11-cv-02404-DDP-JCx

Assigned to Honorable Dean D.
Pregerson

Courtroom 3 – 2nd Floor

**[Proposed] ORDER (1)
PRELIMINARILY APPROVING
PROPOSED SETTLEMENT, (2)
APPROVING FORM OF NOTICE,
CLAIM FORM AND EXCLUSION
FORM, AND (3) SETTING
HEARING FOR FINAL
APPROVAL**

Date: September 28, 2015

Time: 10:00 a.m.

Courtroom: 3 – 2nd Floor

1 Upon the hearing of Plaintiffs' Motion for Preliminary Approval of
2 Settlement, considering all evidence and argument presented, and pursuant to the
3 Settlement Agreement and Release of Claims and the unopposed motion, the Court
4 hereby grants Plaintiffs' request that the Court enter an order: (1) preliminarily
5 approving the terms set forth in the Settlement Agreement and Release of Claims
6 ("Settlement Agreement" or "Settlement"), (2) preliminarily approving the
7 Proposed Notice of Pendency of Class Action Settlement ("Notice"), Claim Form,
8 and Request for Exclusion, (3) preliminarily approving Sloan, Bagley, Hatcher &
9 Perry Law Firm, and the Law Firm Of Joseph H. Low, IV and the Zelbst Law Firm
10 as Class Counsel, (4) preliminarily approving attorney's fees in the amount of
11 \$200,000 and separate costs in the amount of \$146,000.00, (5) preliminarily
12 approving incentive awards in the amounts of \$3,000.00 each to Class
13 Representatives, David Ribot, Perry Hall, Jr., Jonathan Luna, Deborah Mills,
14 Anthony Butler, Jennifer Butler, Lois Barnes and Rita Dunken. The Court further
15 appoints Rust Consulting as the third-party settlement administrator and directs
16 that within 14 day of the signing of this order the Settlement Administrator mail
17 the approved Notice, Claim Form and Request for Exclusion ("Notice Packet") to
18 the Settlement Class Members via regular First-Class U.S. Mail, using the most
19 current mailing addresses available. Class Members will have 60 days from the
20 day that the Notice Packet is mailed to— file Claim Forms or Requests for
21 Exclusion. The hearing to consider final approval of the settlement, entry of a
22 proposed final judgment, and Plaintiff's counsel's application for an award of
23 attorneys' fees and reimbursement of costs and expenses, as well as an
24 Enhancement Award to the Class Representatives, is hereby scheduled for
25 _____, 2015 at ____ a.m. / p.m. in Department 3.

26 Dated: _____, 2015

27 HONORABLE DEAN D. PREGERSON
28 UNITED STATES DISTRICT COURT